

1 THE HONORABLE THOMAS S. ZILLY
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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE WESTERN DISTRICT OF WASHINGTON

11 HUNTERS CAPITAL, LLC, et al.,

12 Case No. 2:20-cv-00983-TSZ

13 Plaintiffs,

14 DECLARATION OF GABRIEL REILLY-
15 BATES IN SUPPORT OF PLAINTIFFS'
16 RESPONSE IN SUPPORT OF CITY OF
17 SEATTLE'S MOTION TO SEAL CERTAIN
18 EXHIBITS

19 CITY OF SEATTLE,

20 Noted: October 14, 2022

21 Defendant.

22 I, Gabriel Reilly-Bates, declare as follows:

23 1. I am an attorney with Morgan Lewis & Bockius LLP and represent Plaintiffs in the
24 above-captioned action. I am over eighteen years of age and am competent to testify herein. I
25 make the following statements based on my personal knowledge.

26 2. On Tuesday, September 27, 2022, in preparation of a meet an confer conference
27 scheduled for Wednesday, September 28, 2022, to satisfy the parties' meet-and-confer obligations
under FRCP 37 and LCR 5(g), counsel for the City indicated that there were several documents that

28 DECLARATION GABRIEL REILLY-BATES
IN SUPPORT OF PLAINTIFFS' RESPONSE IN
SUPPORT OF CITY OF SEATTLE'S MOTION TO
SEAL CERTAIN EXHIBITS
(Case No. 2:20-cv-00983-TSZ) - 1

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101
TEL +1.206.274.6400 FAX +1.206.274.6401

were marked confidential that the City wanted to file in support of its Motion for Spoliation Sanctions and its Motion for Summary Judgment.

3 3. Counsel for both parties discussed the process for reviewing documents to be filed
4 under seal during the meet-and-confer conference on Tuesday, September 27, 2022, and on
5 Wednesday, September 28, 2022, counsel for the City sent an updated list of 14 documents,
6 including exhibits and deposition transcript excerpts, one of which was Ex. 10 to the City’s Motion
7 for Spoliation Sanctions (herein, “Ex. 10,” which is further identified as POQUITOS-000009).

8 4. Counsel for Plaintiffs reviewed the City's list of 14 documents and determined that
9 all but four of the exhibits could be publicly filed.

10 5. Following Plaintiffs' counsel's review of Ex. 10, Plaintiffs' counsel emailed counsel
11 for the City to request that Ex. 10 be filed under seal.

I declare under the penalty of perjury under the laws of the United States of America and
the State of Washington that the foregoing is true and correct.

DATED this 10th day of October, 2022 at Vashon Island, Washington.

s/ Gabriel Reilly-Bates
Gabriel Reilly-Bates

DECLARATION GABRIEL REILLY-BATES
IN SUPPORT OF PLAINTIFFS' RESPONSE IN
SUPPORT OF CITY OF SEATTLE'S MOTION TO
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1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101
TEL +1 206 274 6400 FAX +1 206 274 6401